



August 28, 2002

Idaho Public Utilities Commission  
472 West Washington  
Boise, ID 83702-5983

Attn: Jean D. Jewell  
Commission Secretary

**Re: Case No. PAC-E-02-1; Reconsideration  
Direct Testimony and Related Exhibits of D. Douglas Larson, David Eskelsen and  
Glen Pond on Behalf of PacifiCorp**

Dear Ms. Jewell:

Enclosed for filing with the Commission are the original and nine (9) copies of the direct testimony and related exhibits of D. Douglas Larson, David Eskelsen, and Glen Pond on Reconsideration on behalf of PacifiCorp in the above docket. One copy of the testimony in PDF format will be sent to your attention via email. A diskette containing an electronic version of the testimony in Word is also included. A copy of this testimony and exhibits is being served on all parties of record.

I would appreciate it if you would return a stamped copy of this transmittal letter for our files.

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com).

By Fax (503) 813-6060

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 800  
Portland, OR 97232

Very truly yours,

A handwritten signature in cursive script that reads "Doug Larson / CEO".

Doug Larson,  
Vice President

Enclosure

cc: James F. Fell  
Erinn Kelley-Siel

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

In the Matter of the Application of PacifiCorp,	) CASE NO. PAC-E-02-1
dba Utah Power & Light Company for	)
Approval of its Proposed Electric Service	) DIRECT TESTIMONY AND
Schedules	) EXHIBITS ON RECONSIDERATION
_____	)

**PACIFICORP**

---

**CASE NO. PAC-E-02-1**

**August 28, 2002**

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

In the Matter of the Application of PacifiCorp,	) CASE NO. PAC-E-02-1
dba Utah Power & Light Company for	)
Approval of its Proposed Electric Service	) Direct Testimony on Reconsideration
Schedules	) of D. Douglas Larson
_____	)

**PACIFICORP**

---

**CASE NO. PAC-E-02-1**

**August 28, 2002**

1 Q. Please state your name, occupation and business address.

2 A. My name is D. Douglas Larson. My business address is One Utah Center, Suite  
3 2300, 201 South Main Street, Salt Lake City, Utah 84140-2300. I am the Vice  
4 President of Regulation for PacifiCorp (or the “Company”).

5 **Introduction**

6 Q. Are you the same D. Douglas Larson who submitted direct testimony in this  
7 proceeding?

8 A. Yes.

9 **Purpose of Testimony**

10 Q. What is the purpose of your testimony on reconsideration?

11 A. The purpose of my testimony is to respond to the Commission’s decisions in  
12 Order No. 29034 that Rule 102 of the Commission’s Utility Customer Information  
13 Rules applied to the Company’s Application to recover its deferred excess power  
14 costs and that the Company should pay a credit to each customer of \$20.00, or a  
15 total of \$1,087,720, as a penalty for failure to comply with that Rule. Rule 102  
16 requires that a utility provide customers with individual billing notice of an  
17 application for a general or tracker rate change and issue a press release containing  
18 the same information required in the billing notice. I will describe generally the  
19 role that the Regulation Department plays with respect to customer  
20 communications in the context of regulatory filings and the efforts we make to  
21 fully and clearly inform our customers of pending and approved rate changes. I  
22 will explain that at the time of the filing in this case the Company consulted with

1 counsel about the applicability of Rule 102 and based on counsel's advice  
2 determined that it did not apply. I will then offer as exhibits the press releases,  
3 comments and other materials on file with the Commission demonstrating that  
4 customers were made aware of this filing. In addition, I will introduce the other  
5 Company witnesses on reconsideration and briefly discuss the issues they will  
6 address.

7 **Introduction of Witnesses**

8 Q. Please list the other Company witnesses on reconsideration and provide a brief  
9 description of the subjects they will cover.

10 A. The Company witnesses on reconsideration will be:

11 **David Eskelsen**, who discusses the Company's customer communications  
12 strategy both in general and with respect to this proceeding specifically. Mr.  
13 Eskelsen will also address the direct customer communications that took place in  
14 this proceeding by way of local news media contacts and articles and editorials  
15 resulting from those contacts.

16 **Glen Pond**, who describes direct customer communications that took place in  
17 connection with this proceeding by way of informational meetings and other local  
18 activities.

19 **Regulation Department's Role Generally Respecting Customer Communications**

20 Q. Does the Regulation department take any actions prior to a regulatory filing to  
21 incorporate customer communications into the filing plan?

22 A. Yes. At least one month before the planned filing date for a significant regulatory

1 matter, the Regulation department consults with the Corporate Communications  
2 department regarding the communications plan specific to that filing. The two  
3 departments then work closely together throughout that proceeding to develop and  
4 implement that communications plan.

5 Q. What are the objectives of the communications plan?

6 A. The communications plan is intended to fully and clearly inform customers of the  
7 rate filing. Obviously, we cannot include in a press release or other customer  
8 communication the amount of detail we include in our rate filing, but we  
9 summarize the major features of the filing.

10 Q. What role does the Regulation department generally play with respect to  
11 implementation of a communications plan?

12 A. Before a filing is made, the Regulation department generally makes an effort to  
13 contact customer groups to provide them with information about the proposed  
14 filing. Regulation also consults with legal counsel to ensure compliance with the  
15 relevant state regulatory notice requirements. In addition, we help draft  
16 information regarding the filing that is provided to the Company's call centers to  
17 use in response to customer telephone calls. Finally, once a filing has been made,  
18 representatives of the Regulation department often follow up with specific  
19 customer groups regarding the impact of that filing as it relates to them.

20 Q. Aside from Commission Rules, does the Company have its own reasons for  
21 informing customer groups of planned rate filings?

22 A. Yes. In the first place, customers have told us they need this information for

1 budgeting and business planning purposes. Cooperating with them in this way  
2 improves our customer and community relations. Also, when we inform them in  
3 advance of a filing we find it is easier to work with them in fashioning settlements  
4 of their issues. We communicate with our customers because it is in our own self-  
5 interest to do so. Among other things, it gives us an opportunity to talk to them  
6 about our customer service and explain why the proposed changes to customer  
7 rates are necessary.

8 **Company Contact with Interested Parties Regarding This Filing**

9 Q. Did you have contact with interested parties before this particular filing was  
10 made?

11 A. Yes. On November 19, 2001, Glen Pond and I met in Boise with several  
12 representatives of the irrigation class, Commission staff representatives, and  
13 others to discuss generally the background and context of the proposed filing.  
14 Representative Dell Raybould also attended this meeting.

15 Q. What was the purpose of the November 19 meeting?

16 A. The meeting was conducted as a workshop. In addition to general information  
17 about the proposed filing, the Company presented its proposal with respect to rate  
18 design changes for its irrigation customers. Those in attendance at the meeting  
19 were invited to comment and make recommendations.

20 Q. Did the Regulation department arrange other contacts with customer groups about  
21 this filing?

22 A. Yes. Glen Pond and Robert Smead, our local representatives in southeastern

1 Idaho, had several information meetings with customers regarding this case both  
2 before and after it was filed. In addition, before the case was filed, Mr. Pond and  
3 Bob Lively, manager of the Regulation department, met with the Company's  
4 Customer Advisory Group and discussed the filing in the context of a discussion  
5 regarding the Company's excess power costs that were then being deferred. Mr.  
6 Pond will testify about these meetings.

7 **Company's Efforts to Comply with Notice Requirements**

8 Q. Prior to filing its Application in this proceeding, what action did the Company  
9 take to ensure compliance with the Commission's notice requirements?

10 A. Before the Application was filed, PacifiCorp consulted with its counsel regarding  
11 the applicability of Idaho Rule of Procedure 122, which requires 60 days advance  
12 notice of intent to file a general rate case. Counsel advised PacifiCorp that Rule  
13 122 did not apply to this filing because the filing did not meet the definition of a  
14 general rate case.

15 Q. What notice did the Company provide upon filing its Application?

16 A. The Company complied with the notice requirements prescribed by Rule of  
17 Procedure 123 and Idaho Code § 61-307, which require that the proposed  
18 schedules be filed with the Commission at least 30 days before their effective date  
19 and be kept open for public inspection at the Company's local offices. In  
20 addition, the Company issued a press release on January 7, 2002 describing the  
21 Application. This press release is included in Exhibit 31 to the testimony of Mr.  
22 Eskelsen. The press release separately explained the increase in the BPA



1 exchange credit, the request for a surcharge to recovery deferred excess power  
2 costs and the amount of excess power costs sought to be recovered. The press  
3 release also explained the proposed cost of service changes and rate mitigation  
4 plan. The rate mitigation plan, if adopted as proposed, would have ensured that  
5 no customer class would receive a rate increase during the period of the power  
6 cost surcharge. On a net basis, the rate filing did not propose a rate increase for  
7 any customer class.

8 Q. Did the Company consider whether any other notice was required in this  
9 proceeding?

10 A. Yes. Within a few days after filing its Application, the Company consulted with  
11 counsel regarding the applicability of Rule 102 of the Commission's Utility  
12 Customer Information Rules. Counsel advised the Company that, because this  
13 filing did not meet the definition of either a general or a tracker rate case, bill-  
14 stuffer notice under Rule 102 was not required. Exhibit No. 26 is a copy of the e-  
15 mail correspondence regarding this advice.

16 Q. Did the Company rely on that advice?

17 A. Yes. Based on that advice, the Company did not provide bill-stuffer notice to  
18 customers regarding its Application. However, as explained in more detail by Mr.  
19 Eskelsen, although PacifiCorp understood that bill-stuffer notice was not required,  
20 the Company nevertheless considered whether and when to provide customers  
21 with individual notice of its rate change. In our experience, customers can be  
22 confused by multiple notices regarding the same rate filing. With each notice,

1 they believe there is a new rate change. This is a situation where we run into a  
2 conflict between providing early communication to our customers and providing  
3 clear communication. When multiple communications are understood by  
4 customers as multiple rate changes, the clarity of the communications is  
5 compromised. Because the Company was planning to provide individual  
6 customer notice of the final, approved rate change, we decided not to provide  
7 individual notice in advance of the change. We chose to focus the individual  
8 notice on the approved change because that change would not be subject to  
9 adjustment - as filed changes are - and the new rates would soon be reflected in  
10 customers' bills.

11 Q. Did PacifiCorp notify customers after the Commission approved the proposed  
12 Stipulation and Settlement in this proceeding?

13 A. Yes. The Commission Order approving the proposed Stipulation and Settlement  
14 in this proceeding was issued on June 7, 2002 and, as a result, customers' rates  
15 were changed effective with service on and after June 8, 2002. PacifiCorp  
16 notified customers individually regarding the nature of those changes by way of a  
17 message printed directly on their bills.

18 **Amount of Penalty**

19 Q. If the Commission decides that Rule 102 applied in this case, do you believe the  
20 amount of the penalty assessed is reasonable under the circumstances?

21 A. No. The circumstances of this case do not warrant assessment of a penalty,  
22 particularly not a large one. The Company did not ignore the Commission's

1 Customer Information Rules or take lightly its responsibility to communicate with  
2 customers about this filing. We sought and followed the advice of counsel  
3 regarding legal notice requirements, we developed and followed a customer  
4 communication plan for this filing, we issued press releases and met with  
5 customer groups, and there was significant public comment on this filing and  
6 participation in the public hearings. If there was a violation of Rule 102, it was  
7 the result of a good faith misreading of the Rule, not the result of indifference to  
8 the Commission's Rules or customer communications. Also, the lack of  
9 individual notice did not deprive the Commission of a full airing of the proposed  
10 rate change and the issues that change presented. Clearly, customers knew about  
11 this filing and expressed themselves both by way of written comments and  
12 protests at the public hearings. No one has claimed that because of the lack of  
13 individual notice, a material issue did not get raised or considered.  
14 Moreover, to my knowledge, the Commission has never before treated a utility so  
15 harshly for a violation of its Rules, or even for a violation of the utility's own  
16 tariffs and the public utility statutes. The largest penalty of which I am aware is  
17 \$75,000 assessed against Washington Water Power for failing to comply with its  
18 own line extension tariffs for a period of 41 months. The difference in size of  
19 these penalties is striking and something I cannot understand or explain.

20 **Exhibits**

21 Q. Are there any exhibits you would like to introduce into the record?

22 A. Yes. Each of the following exhibits contains information obtained from the

Commission's file in this proceeding.

Q. Please describe Exhibit No. 27.

A. Exhibit No. 27 includes all of the press releases issued by the Commission in this proceeding. These press releases are in addition to the press releases that were issued by the Company as described in Mr. Eskelsen's testimony. The first of these Commission press releases was issued on January 16, 2002. It announces and describes the Company's Application for recovery of its excess power costs, the increase in the BPA exchange credit, and the overall percentage change from current rates that would result if the Application were approved as filed. The January 16 release also announces the procedural schedule set at that time for expedited consideration of implementation of the BPA credit and for separate consideration of the remainder of the Company's filing, as well as the means by which the public could participate and/or comment on the Application. The second release, issued on January 31, 2002, announced the implementation of the BPA credit as of February 1 and reiterated that the remainder of the Company's filing was still under review by the Commission. On February 27, 2002, the Commission issued a third press release that described again the components of the Company's filing that remained outstanding. The February 27 release also explained that settlement negotiations were underway among the parties and announced the preliminary hearing dates that had been scheduled in the case. On April 12, 2002, a fourth press release was issued describing the Commission's decision that PacifiCorp's Application did not violate the rate increase

1 moratorium in the Commission's Order on the ScottishPower merger. Ten days  
2 later, on April 22, 2002, the Commission issued a fifth press release announcing  
3 specific information regarding the dates, times and locations that workshops and  
4 public hearings would be held regarding the settlement that had been reached  
5 among the parties. Finally, on June 6, 2002, the Commission issued its final press  
6 release in this proceeding announcing its decision to approve the settlement and  
7 explaining the overall impact the surcharge, BPA credit, and modified rate  
8 mitigation adjustment would have on customer rates.

9 Q. Please describe Exhibit No. 28.

10 A. Exhibit No. 28 includes all of the written public comments submitted to the  
11 Commission regarding the Company's rate filing. The Commission received  
12 approximately 30 written comments in this proceeding from PacifiCorp  
13 residential, industrial and irrigation customers, as well as their legislative  
14 representatives. The letters demonstrate that customers were well aware of the  
15 pending request for recovery of excess power costs and the other major issues  
16 presented by the Company's Application.

17 Q. Please describe Exhibit No. 29.

18 A. Exhibit No. 29 includes the lists of public witnesses that testified at the May 6 and  
19 7, 2002 public hearings in this proceeding. As the Commission is aware, more  
20 customers attended these hearings than signed up to testify. The fact that these  
21 hearings were well attended by customers and their legislative representatives  
22 further demonstrates that customers were well aware of the pending request for

1 recovery of excess power costs and the other major issues presented.

2 Q. Please describe Exhibit No. 30.

3 A. Exhibit No. 30 is a copy of intervenor Timothy Shurtz's request for intervenor  
4 funding in this proceeding. In that request, Mr. Shurtz describes his activities in  
5 communicating with PacifiCorp customers about the pending rate change. Mr.  
6 Shurtz and others were active in stimulating interest in this case and particularly  
7 in opposing the Company's recovery of its excess power costs.

8 Q. Does this conclude your testimony?

9 A. Yes.

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

In the Matter of the Application of PacifiCorp,	) CASE NO. PAC-E-02-1
dba Utah Power & Light Company for	)
Approval of its Proposed Electric Service	) Direct Testimony on Reconsideration
Schedules	) of David Eskelsen
	)

---

**PACIFICORP**

---

**CASE NO. PAC-E-02-1**

**August 28, 2002**

1 Q. Please state your name and business address.

2 A. My name is David Eskelsen. My business address is One Utah Center, Suite  
3 2300, 201 South Main Street, Salt Lake City, Utah 84140-2300.

4 **Qualifications**

5 Q. Please describe your employment history with PacifiCorp (or the "Company").

6 A. I joined the company August 18, 1986, assigned to write and edit the Company's  
7 employee newspaper. In succeeding years, I have continued in various  
8 assignments in the Company's Corporate Communications department in both  
9 internal and external communications assignments.

10 Q. What are your responsibilities?

11 A. My responsibilities include providing communications and public relations  
12 counsel to PacifiCorp managers and executives, and acting as the Company's lead  
13 news media spokesman in Idaho, Utah and Wyoming.

14 Q. What is your educational background?

15 A. I have Bachelor of Science degree in Journalism from Utah State University,  
16 Logan, Utah, and seven years experience as a newspaper reporter.

17 **Purpose of Testimony**

18 Q. What is the purpose of your testimony.

19 A. The purpose of my testimony is twofold: First, I will discuss the Company's  
20 general practices with respect to customer communications in the context of  
21 regulatory matters. Second, I will address the Company's customer  
22 communications strategy particular to this proceeding. I will also describe the



1 direct customer communications that took place in this proceeding by way of local  
2 news media contacts, articles and editorials resulting from those contacts.

3 **PacifiCorp's General Customer Communications Practices**

4 Q. What is the Company's general strategy with respect to customer communications  
5 in the context of regulatory matters?

6 A. First, we seek guidance from the Company's Regulation department and legal  
7 counsel on compliance with regulatory notice requirements. Second, we choose  
8 from a variety of communications vehicles and tactics to make as much  
9 information available to customers as possible, while providing clarity and  
10 context to the complex process of setting utility rates.

11 Q. In general, when PacifiCorp makes a regulatory filing, what steps are taken to  
12 ensure compliance with regulatory notice requirements and to advance the  
13 Company's strategy to make available as much information to customers as  
14 possible?

15 A. Corporate Communications drafts a communications plan, which outlines the  
16 major issues of the regulatory filing and the time line for filings and hearings. The  
17 plan lists internal and external target audiences for this information and discusses  
18 which of the various communications vehicles should be employed, and when,  
19 together with draft versions of these materials. The plan is circulated to the  
20 Regulation department, legal counsel and selected Company executives for review  
21 and comment.

22 Q. Please describe the various methods the Company employs to provide notice to

1 customers of its regulatory filings.

2 A. These methods include background information for employees who have personal  
3 contact responsibilities with larger industrial and commercial customers and  
4 elected officials; news releases; background information provided to customer  
5 service representatives to use in response to customer telephone calls; bill  
6 messages; bill inserts; and in some cases, paid advertising.

7 **PacifiCorp's Customer Communications Strategy in this Proceeding**

8 Q. Was the Company's communications strategy in this proceeding consistent with  
9 its general communications strategy?

10 A. Yes. The Company's overall strategy—to comply with regulatory notice  
11 requirements and make available as much information to customers as possible,  
12 consistent with clarity—remained the same.

13 Q. What specifically did the Company decide was necessary in this case to effectuate  
14 those objectives?

15 A. The Company communications plan included a news release concurrent with the  
16 initial filing, plus follow-up contacts with news media, as needed. Another news  
17 release was contemplated upon a final ruling by the Commission. The plan also  
18 contained a task for seeking a determination from legal counsel concerning  
19 requirements for legal notices and bill inserts related to the proceeding.

20 Q. Did the Company consider including in its communications plan individual notice  
21 to customers regarding the power cost recovery Application?

22 A. Yes, we did. We planned to provide customers with individual notice of the

1 impact on customer rates, if any, at some point, and considered whether the notice  
2 should be provided at the time of the filing or after the final order was issued.

3 Q. What did you decide?

4 A. The Company was advised by counsel that individual customer notice at the time  
5 of the power cost recovery filing was not required by the Idaho Rules. Although  
6 PacifiCorp did not think such notice was required, the Company still considered  
7 providing individual notice at the time of the filing as a matter of customer  
8 communications. In the Company's experience, however, customers can be  
9 confused by multiple notices regarding the same filing. In the interest of clarity of  
10 communication, the Company instead decided that it would individually notify  
11 customers when the Commission issued a decision regarding its Application, if  
12 that decision resulted in a rate change.

13 Q. What did the Company do to implement its communications plan in this  
14 proceeding?

15 A. The Company responded to news media inquiries prior to the filing of the case on  
16 January 4, 2002. These inquiries were mainly in response to expectations that the  
17 Company would file a rate proceeding in January 2002. Upon filing of the case, a  
18 news release was issued to news outlets in the Company's service area in Idaho  
19 and posted on the Utah Power internet web site. Company rate schedules were  
20 made available for public inspection at local offices. In addition, Glen Pond's  
21 testimony will address the direct customer communications that took place in this  
22 proceeding by way of informational meetings and other local activities of which

1 he is aware.

2 Q. Please describe Exhibit No. 31.

3 A. Exhibit No. 31 includes all of the press releases issued by the Company in this  
4 proceeding.

5 Q. To whom did the Company circulate those releases?

6 A. News releases regarding Company issues in Idaho were sent to the following news  
7 media outlets: *Fall River Review*, Ashton; KDIK-TV, Idaho Falls; KIFI-TV, Idaho  
8 Falls; KID Radio, Idaho Falls; the *Idaho Post-Register*, Idaho Falls; the Idaho  
9 *Enterprise*, Malad; KVSI Radio, Montpelier; the *News-Examiner*, Montpelier; KPVI-  
10 TV, Pocatello; *Idaho State Journal*, Pocatello; the *Preston Citizen*, Preston; the  
11 *Standard-Journal*, Rexburg; the *Jefferson Star*, Rigby; the *Shelley Pioneer*, Shelley.

12 Q. Apart from those press releases, did the Company have any direct communication  
13 with the Idaho news media?

14 A. Yes. In December 2001, my associate, Kimball Hansen, conducted an interview  
15 with Steve Fishbaugh, a reporter for the Idaho Falls *Post-Register*, concerning the  
16 two year rate moratorium the Commission imposed on the Company before  
17 approving its merger with ScottishPower, and the prospects for a power cost  
18 recovery filing in January. The article appeared Dec. 22, 2001 in the Idaho Falls  
19 *Post-Register*, and that same week in the *Post-Register's* weekly publication,  
20 *Intermountain Farm & Ranch*. I conducted interviews with news reporters about  
21 the rate filing on the following dates: January 7, 2002 with Joyce Edlefsen,  
22 Rexburg *Standard-Journal*; March 3, 2002 with Harriet King, McGraw-Hill

1 (energy trade publications); March 19, 2002 with a consumer writer from the  
2 *Post-Register*; April 24, 2002 with Steve Fishbaugh, *Post-Register*; May 3, 2002  
3 with Eric Mittendal, KIFI-TV Ch. 8, Idaho Falls; May 7, 2002 with the *Preston*  
4 *Citizen* reporter who covered the IPUC field hearing there; June 7, 2002 with Paul  
5 Menser, Idaho Falls *Post-Register*; June 13, 2002 with Jude Noland, *Clearing Up*  
6 (a trade publication).

7 Q. Please describe Exhibit No. 32.

8 A. Exhibit No. 32 is a chronological collection of newspaper articles, letters to the  
9 editor and editorials published in Idaho newspapers regarding the Company's  
10 Application in this case.

11 Q. You mentioned earlier in your testimony that the Company's communications  
12 plan included individually noticing customers of a Commission-ordered rate  
13 change by way of a bill message. Were bill messages regarding the rate changes  
14 in this case sent to PacifiCorp customers after the Commission issued its Order?

15 A. Yes. The Commission approved the proposed Stipulation and Settlement in this  
16 case on June 7, 2002 and, as a result, Idaho customers' rates were changed  
17 effective with service on and after June 8, 2002.

18 Q. Does this conclude your testimony?

19 A. Yes.

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

In the Matter of the Application of PacifiCorp,	) CASE NO. PAC-E-02-1
dba Utah Power & Light Company for	)
Approval of its Proposed Electric Service	) Direct Testimony on Reconsideration
Schedules	) of Glen Pond
	)

---

**PACIFICORP**

---

**CASE NO. PAC-E-02-1**

**August 28, 2002**

1 Q. Please state your name and business address.

2 A. My name is Glen Pond. My business address is One Utah Center, Suite 2300,  
3 201 South Main Street, Salt Lake City, Utah 84140-2300.

4 **Qualifications**

5 Q. Please describe your employment history with PacifiCorp (or the "Company").

6 A. I have been with the Company 19 years, all of which have been spent serving the  
7 Company's Idaho service territory. During my tenure at the Company, I have  
8 worked in the following areas: accounting, customer service, and community and  
9 economic development.

10 Q. What is your current position at the Company?

11 A. I am the Regional Community Manager for the Company's Idaho service territory.

12 Q. What are your responsibilities as the Idaho Regional Community Manager?

13 A. I act as the Company representative and facilitate communication between the  
14 Company and the Idaho public entities the Company serves. I also work with  
15 economic development groups in the area.

16 Q. What is your educational background?

17 A. I have a Bachelor of Arts degree in Finance and Marketing from Brigham Young  
18 University.

19 **Purpose of Testimony**

20 Q. What is the purpose of your testimony?

21 A. The purpose of my testimony is to describe the Company's direct communications  
22 with customers that took place in this proceeding by way of informational

Pond, Di - 1  
PacifiCorp

1 presentations at meetings and other local activities of which I am aware.

2 **Informational Meetings with Customers**

3 Q. Please describe your involvement in this proceeding.

4 A. Before the Company filed its Application in this case, I met with representatives  
5 of various customer groups and discussed generally the background and context of  
6 the Company's proposed filing. In addition, as part of the Company's  
7 communications plan in this proceeding, I was asked to develop an informational  
8 presentation regarding the Company's power cost recovery filing and BPA credit  
9 certification. I developed that presentation and Robert Smead, the Company's  
10 Idaho Irrigation Specialist, and I presented it to various groups after the Company  
11 filed its Application.

12 Q. Please describe Exhibit No. 33.

13 A. Exhibit No. 33 is a table that contains information regarding each of the meetings  
14 Mr. Smead or I attended both before and after the Company's Application was  
15 filed.

16 Q. Did you have any other contact with customers regarding this proceeding?

17 A. Yes. One of my responsibilities as Regional Community Manager is to meet  
18 regularly with a representative group of PacifiCorp's Idaho customers entitled the  
19 "Consumer Advisory Group" to discuss Company activities. This power cost  
20 recovery filing was the topic of a presentation and round-table discussion at two  
21 of those Consumer Advisory Group meetings.

22 Q. Please describe those two Consumer Advisory Group meetings.



1 A. The first of those meetings took place on August 29, 2001, and the second on  
2 January 24, 2002. I asked Bob Lively, Manager, Regulation at PacifiCorp, to  
3 attend both of these meetings with me. At the August 29, 2001 Consumer  
4 Advisory Group meeting, we made a presentation and answered questions  
5 regarding the Company's excess power costs that were at that time being deferred  
6 pursuant to Commission approval. We also discussed other items of interest  
7 concerning our irrigation customers and our company structure and community  
8 involvement. At the Consumer Advisory Group meeting on January 24, 2002, we  
9 discussed the Company's then-recent excess power cost recovery filing and, in  
10 particular, issues related to the Hunter 1 generator outage.

11 Q. Is that the same Bob Lively who submitted direct testimony in this proceeding?

12 A. Yes.

13 Q. Who generally attends Consumer Advisory Group meetings?

14 A. The following is the list of representatives currently invited to attend Consumer  
15 Advisory Group meetings: (1) Bonneville County Commissioner, Lee Staker; (2)  
16 Joyce Edlefsen (representative from St. Anthony); (3) Mayor of Ammon, Bruce  
17 Ard; (4) Roy Smith (Chairman of the Group); (5) Jeff Siddoway (representative  
18 from Terreton); (6) Mayor of Malad, Spence Horsley; (7) Bear Lake County  
19 Commissioner, Dwight Cochran; (8) George Wilcox (representative from  
20 Preston); (9) Donna Benfield (representative from Rexburg); (10) Diana Richman  
21 (representative from Teton); and (11) Richard Westerberg (representative from  
22 Preston).

1 Q. Do you have a record of the individuals who attended the two particular  
2 Consumer Advisory Group meetings at which elements of this proceeding were  
3 discussed?

4 A. The following is a list of the individuals who attended the meeting on August 29,  
5 2001: (1) Mary Ann Mounts (representative from Rexburg who has since  
6 resigned); (2) Heber Hansen (Mayor of Shelley who attended the meeting as a  
7 guest); (3) Roy Smith; (4) Joyce Edlefsen; and (5) Bruce Ard. The following is a  
8 list of the individuals who attended the meeting on January 24, 2002: (1) George  
9 Wilcox; (2) Dwight Cochran; (3) Lee Staker; (4) Spence Horsley; and (5) Bruce  
10 Ard.

11 Q. Does this conclude your testimony?

12 A. Yes.